



The WALT DISNEY Company

Susan L. Fox
Vice President
Government Relations

March 2, 2012

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, S.W.
Washington, D.C. 20054

RE: Notice of Ex Parte Communication
MB Docket No. 00-168

Dear Ms. Dortch:

On Wednesday, February 29, 2012, Bernie Prazenica (President & General Manager, WPVI-TV), Christopher Larcade (VP, Sales & Political Advertising, ABC National TV Sales), and Susan Fox (VP, Government Relations, The Walt Disney Company) met with Sherrese Smith, Office of Chairman Genachowski, Chief Counsel & Legal Advisor and Jessica Almond, Special Counsel. During that meeting, the undersigned noted that, while we support putting most of broadcasters' current public files online, placing the entire political file online on an immediate basis raises significant concerns, as earlier explained in Joint Reply Comments filed in this proceeding.

Specifically, the ABC representatives noted the logistics involved in such a requirement, as well as the potential anticompetitive effect of making individual advertising rates information widely available online where competitors in the market and commercial advertisers may anonymously glean highly sensitive pricing data, which, by law, will represent the lowest rates charged by the station to its most favored commercial advertisers. They also pointed to the suggestion in the joint comments that we can continue to make "dates and dollars" information available over the phone to political time buyers. The ABC representatives stressed that, contrary to comments made by some advocates in this proceeding, there is no readily available one-size-fits-all solution to significantly reduce the burden imposed by the proposal. They also explained that the process for placing political ads on a station is complex and can involve extensive discussions over a period of time.



This letter is being submitted electronically in the above-referenced docket, which has been granted permit-but-disclose status, pursuant to Section 1.1206(b) of the Commission's Rules. Should you have any questions concerning this submission, kindly contact the undersigned.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read 'Susan Fox', written over a vertical line.

Susan Fox
Vice President, Government Relations
The Walt Disney Company

cc: Sherrese Smith
Jessica Almond